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WEILAND GOLDEN GOODRICH LLP
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Attorneys for Chapter 7 Trustee
Jeffrey I. Golden

UNITED STATES BANKRUPTCY COURT
CENTRAL DISTRICT OF CALIFORNIA
SANTA ANA DIVISION

In re
TIM M. McKENNA,
Debtor.

Case No. 8:18-bk-13588-SC
Chapter 7

JEFFREY I. GOLDEN, Chapter 7 Trustee
for the estate of Tim M. McKenna,
Plaintiff,

Adv. No. 8:19-ap-01176-SC

**STIPULATION TO AMEND SCHEDULING
ORDER AND EXTEND DISCOVERY
DEADLINES**

v.

JASON CAUFIELD, individually and as
trustee of the Caufield Revocable Trust,
Defendant.

**TO THE HONORABLE SCOTT C. CLARKSON, UNITED STATES BANKRUPTCY
JUDGE; THE OFFICE OF THE UNITED STATES TRUSTEE; AND ALL PARTIES
ENTITLED TO NOTICE:**

This stipulation ("Stipulation") is entered into by and between Jeffrey I. Golden, the
duly appointed and acting chapter 7 trustee ("Trustee") of the bankruptcy estate ("Estate")
of Tim M. McKenna ("Debtor"), Robert S. Whitmore, in his capacity as the chapter 7
trustee ("MGE Trustee") of the bankruptcy estate of McKenna General Engineering, Inc.

("MGE"), Howard B. Grobstein, in his capacity as the chapter 7 trustee ("Irontrac Trustee") of the bankruptcy estate of Irontrac, Inc. ("Irontrac"), and Jason Caufield ("Defendant", and collectively with the Trustee, MGE Trustee, and Irontrac Trustee, the "Parties"), by and through their respective counsel. The Parties stipulate and agree as follows:

RECITALS

A. On September 27, 2018, Debtor filed a voluntary chapter 7 bankruptcy petition, commencing Case No. 8:18-bk-13588-SC.

B. On September 21, 2018, MGE filed a voluntary chapter 7 bankruptcy petition, commencing Case No. 6:18-bk-18036-SY. Debtor was the principal of MGE.

C. On September 25, 2018, Irontrac filed a voluntary chapter 7 bankruptcy petition, commencing Case No. 6:18-bk-18109-SY. Debtor was the president and principal shareholder of Irontrac.

D. On August 29, 2019, the Trustee filed a complaint ("Complaint") against Defendant for the avoidance, preservation, and recovery of fraudulent transfers pursuant to 11 U.S.C. §§ 548, 550, and 551.

E. The Trustee filed a Status Conference and Scheduling Order Pursuant to LBR 7016-1(a)(4) ("Scheduling Order") on December 6, 2019.

F. The transfers described in the Complaint include the transfer of assets that were property of MGE and Irontrac, respectively, at the time of transfer, and therefore the claims resulting from the transfer of such property are assets of each respective bankruptcy estate. As a result, Trustee will file an amended complaint specifying the ownership interests of each of the assets involved in the transfers.

G. The Parties have agreed to modify the Scheduling Order.

STIPULATION

NOW, THEREFORE, based upon the foregoing recitals, and subject to Court approval, the Parties hereby stipulate and agree as follows:

1. The Trustee may file an amended complaint on or before January 9, 2020.

2. The MGE Trustee and Irontrac Trustee may file cross-claims related to the Complaint or amended complaint on or before January 30, 2020.

3. Defendant may file an answer to the amended complaint and cross-claims on or before March 3, 2020.

4. The status conference, currently set for May 27, 2020 at 10:00 a.m. will be continued to August 5, 2020, at 11:00 a.m.

5. A pre-trial conference, currently set for May 27, 2020 at 10:00 a.m. will be continued to August 5, 2020, at 11:00 a.m.

6. The last day for pre-trial motions to be filed and served is continued to July 7, 2020.

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1 7. The last day for discovery to be completed is continued to June 9, 2020.

3 DATED: January 9, 2020

WEILAND GOLDEN GOODRICH LLP

By: /s/ Reem J. Bello

REEM J. BELLO
RYAN W. BEALL
Attorneys for Chapter 7 Trustee
JEFFREY I. GOLDEN

8 DATED: January____, 2020

MARSHACK HAYS LLP

By: _____

D. EDWARD HAYS
CHAD V. HAES
TINHO MANG
Attorneys for Chapter 7 Trustee of the
Bankruptcy Estate of McKenna
General Engineering, Inc.,
ROBERT S. WHITMORE

14 DATED: January____, 2020

MARGULIES FAITH, LLP

By: _____

JEREMY W. FAITH
MEGHANN A. TRIPLETT
Attorneys for Chapter 7 Trustee of the
Bankruptcy Estate of Irontrac, Inc.,
HOWARD B. GROBSTEIN

19 DATED: January____, 2020

BROWN AND BROWN LLP

By: _____

TYLER H. BROWN
Attorneys for Defendant,
JASON CAUFIELD

1 7. The last day for discovery to be completed is continued to June 9, 2020.

2 DATED: January __, 2020

WEILAND GOLDEN GOODRICH LLP

4 By: _____

REEM J. BELLO
RYAN W. BEALL
Attorneys for Chapter 7 Trustee
JEFFREY I. GOLDEN

7 DATED: January 2, 2020

MARSHACK HAYS LLP

9 By: _____

D. EDWARD HAYS
CHAD V. HAES
TINHO MANG
Attorneys for Chapter 7 Trustee of the
Bankruptcy Estate of McKenna
General Engineering, Inc.,
ROBERT S. WHITMORE

14 DATED: January __, 2020

MARGULIES FAITH, LLP

16 By: _____

JEREMY W. FAITH
MEGHANN A. TRIPLETT
Attorneys for Chapter 7 Trustee of the
Bankruptcy Estate of Irontrac, Inc.,
HOWARD B. GROBSTEIN

19 DATED: January L, 2020

BROWN AND BROWN LLP

21 By: _____

TYLER H. BROWN
Attorneys for Defendant,
JASON CAUFIELD

Weiland Golden Goodrich LLP
650 Town Center Drive, Suite 600
Costa Mesa, California 92626
Tel 714-996-1000 Fax 714-996-1002

7. The last day for discovery to be completed is continued to June 9, 2020.

DATED: January__, 2020

WEILAND GOLDEN GOODRICH LLP

By: _____

REEM J. BELLO
RYAN W. BEALL
Attorneys for Chapter 7 Trustee
JEFFREY I. GOLDEN

DATED: January__, 2020

MARSHACK HAYS LLP

By: _____

D. EDWARD HAYS
CHAD V. HAES
TINHO MANG
Attorneys for Chapter 7 Trustee of the
Bankruptcy Estate of McKenna
General Engineering, Inc.,
ROBERT S. WHITMORE

DATED: January 6, 2020

MARGULIES FAITH, LLP

By: _____

JEREMY W. FAITH
MEGHANN A. TRIPLETT
Attorneys for Chapter 7 Trustee of the
Bankruptcy Estate of Irontrac, Inc.,
HOWARD B. GROBSTEIN

DATED: January__, 2020

BROWN AND BROWN LLP

By: _____

TYLER H. BROWN
Attorneys for Defendant,
JASON CAUFIELD

Weiland Golden Goodrich LLP
650 Town Center Drive, Suite 800
Costa Mesa, California 92626
Tel 714-966-1000 Fax 714-966-1002

PROOF OF SERVICE OF DOCUMENT

I am over the age of 18 and not a party to this bankruptcy case or adversary proceeding. My business address is:

**650 Town Center Drive, Suite 600
Costa Mesa, California 92626**

A true and correct copy of the foregoing document entitled (*specify*): Stipulation to Amend Scheduling Order and Extend Discovery Deadlines

will be served or was served **(a)** on the judge in chambers in the form and manner required by LBR 5005-2(d); and **(b)** in the manner stated below:

1. TO BE SERVED BY THE COURT VIA NOTICE OF ELECTRONIC FILING (NEF): Pursuant to controlling General Orders and LBR, the foregoing document will be served by the court via NEF and hyperlink to the document. On (*date*) January 9, 2020, I checked the CM/ECF docket for this bankruptcy case or adversary proceeding and determined that the following persons are on the Electronic Mail Notice List to receive NEF transmission at the email addresses stated below:

☒ Service information continued on attached page

2. SERVED BY UNITED STATES MAIL:

On (*date*) January 9, 2020, I served the following persons and/or entities at the last known addresses in this bankruptcy case or adversary proceeding by placing a true and correct copy thereof in a sealed envelope in the United States mail, first class, postage prepaid, and addressed as follows. Listing the judge here constitutes a declaration that mailing to the judge will be completed no later than 24 hours after the document is filed.

☐ Service information continued on attached page

3. SERVED BY PERSONAL DELIVERY, OVERNIGHT MAIL, FACSIMILE TRANSMISSION OR EMAIL (*state method for each person or entity served*): Pursuant to F.R.Civ.P. 5 and/or controlling LBR, on (*date*) January 9, 2020, I served the following persons and/or entities by personal delivery, overnight mail service, or (for those who consented in writing to such service method), by facsimile transmission and/or email as follows. Listing the judge here constitutes a declaration that personal delivery on, or overnight mail to, the judge will be completed no later than 24 hours after the document is filed.

Served by Personal Delivery

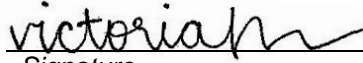
Honorable Scott C. Clarkson
United States Bankruptcy Court
Central District of California
Ronald Reagan Federal Building and Courthouse
411 West Fourth Street, Suite 5130 / Courtroom 5C
Santa Ana, CA 92701-4593

☐ Service information continued on attached page

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct.

1/9/2020
Date

Victoria Rosales
Printed Name


Signature

This form is mandatory. It has been approved for use by the United States Bankruptcy Court for the Central District of California.

TO BE SERVED BY THE COURT VIA NOTICE OF ELECTRONIC FILING (NEF):

Ryan W Beall rbeall@lwglfp.com, vrosales@wglfp.com;kadele@wglfp.com
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